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March 15, 2005

By Facsimile

Thane D. Scott, Esq.
Palmer & Dodge, LLP
111 Huntington Avenue
at Prudential Center
Boston, MA 02199-7613

Re: Shareholder.com v. CCBN.com, et al.

Dear Thane:

This responds to your March 10 letter to me as well as other matters.

First, as to your March 10 letter to me and to Rich inviting Mr. Adler to act as if he were a party until (and if) he becomes one, Rich's May 14 response declining your invitation renders any response from me unnecessary.

As to your March 10 letter to me, I see no point in correcting your numerous mischaracterizations of defendants' position regarding Mr. Adler or of the transcript of Mr. Adler's deposition. In any event, I fail to see any inconsistency in the fact that defendants and Mr. Adler may have a joint defense arrangement with respect to the defense of plaintiffs' claims and defendants' position that, had Mr. Adler accessed plaintiff's computer system, he was not doing so at defendants' behest or in the course of defendants' business.

As to taking Mr. DeCastro's deposition on March 22 beginning at noon, I will agree to accommodate that schedule only on condition that you agree—in the event we cannot complete Mr. DeCastro's deposition by 6:30 p.m. (something I will endeavor in good faith to do)—Mr. DeCastro agrees to return at a mutually agreeable time. I simply cannot agree to evening hours on the 22nd as I have unavoidable parental obligations. If that agreement is not acceptable to you, please inform me immediately.

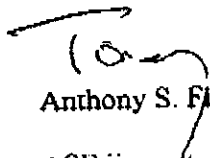
Also, Rich called to tell me that Mr. Adler is available on March 31 to complete his deposition. As he is a non-party, I propose we finish him on that date and agree on another date for Mr.

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Thane D. Scott, Esq.
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Barrett. Please call or e-mail me as soon as possible concerning this as Rich is leaving this afternoon for the rest of the week and must settle the date before he leaves.

Very truly yours,


Anthony S. Flotto
ASF:ji

cc: Richard J. McCarthy, Esq. (by facsimile)